

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE: AMERICAN MEDICAL  
COLLECTION AGENCY, INC.,  
CUSTOMER DATA SECURITY BREACH  
LITIGATION

*This Document Relates To: All Tracks*

Civil Action No. 19-md-02904(MCA)(MAH)

**CONSOLIDATED  
SCHEDULING ORDER**

WHEREAS on May 26, 2022 the Court entered a Discovery Order (ECF No. 345) (the “Discovery Order”) setting forth deadlines for stated events to be completed: and

WHEREAS on October 11, 2022, the Court entered an Order (ECF No. 400) extending certain of the dates in the Discovery Order with respect to the Other Labs Track; and

WHEREAS on October 17, 2022, the Court entered an Order (ECF No. 403) extending certain of the dates in the Discovery Order with respect to the Quest/Optum and Labcorp Tracks; and

WHEREAS on the telephone conference with the parties on November 21, 2022, for the ease of case management, the Court requested that the parties prepare a consolidated scheduling order setting forth the operative deadlines in each Track in a single document; and

WHEREAS the parties have prepared and met and consulted on such a consolidated order and consent to the form hereof; and

Good cause appearing,

IT IS this 6<sup>th</sup> day of December, 2022,

ORDERED that the following are the operative deadlines for the events set forth below:

Event	Quest/Labcorp Track dates	Other Labs Track dates
Substantial completion of document production in response to written discovery served by May 27, 2022	November 14, 2022	December 10, 2022

Event	Quest/Labcorp Track dates	Other Labs Track dates
Service of all written discovery on parties <sup>1</sup>	December 6, 2022	January 2, 2023
Motion to add new parties or amend pleadings, whether by amended or third-party complaint	December 9, 2022	January 3, 2023
Bring discovery disputes from party written discovery to the Court's attention	December 23, 2022	January 13, 2023
Service of subpoenas for production of documents on third parties	December 29, 2022	January 2, 2023
Depositions of party fact witnesses and individuals who will give lay opinion testimony	February 20, 2023	March 17, 2023

Event	All Tracks Date
Depositions of third party fact witnesses and individuals who will give lay opinion testimony	March 17, 2023
Plaintiffs to serve motions for class certification and expert reports in support of class certification	April 17, 2023
Plaintiffs to make any experts available for deposition, unless defendants agree to a later date	May 17, 2023
Defendants to serve briefs in opposition to class certification, motions challenging plaintiffs' class certification experts, and expert reports in opposition to class certification	July 17, 2023
Defendants to make any experts available for deposition, unless plaintiffs agree to a later date	August 16, 2023
Plaintiffs to serve reply briefs in support of class certification, motions challenging defendants' class certification experts, and rebuttal expert reports in support of class certification	August 29, 2023
Parties to file all class certification papers	September 2, 2023

and it is further

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<sup>1</sup> Pursuant to agreement of the Parties, the deadline for Defendants Quest and Optum360 to respond to Plaintiffs' First Requests for Admission is extended to December 20, 2022 and the deadline for Labcorp to respond to Plaintiffs' Second Requests for Admission is extended to January 4, 2023.

ORDERED that all other provisions stated in the Discovery Order remain in effect; and it is further

ORDERED that there will be a telephone conference on **February 21, 2023 at 3:00 p.m.**

Counsel shall dial 1-888-684-8852 and enter access code 1456817# to join the call; and it is further

ORDERED that any further requests to modify this scheduling order shall be accompanied by a jointly proposed amended schedule substantially in this form.

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s/ Michael A. Hammer  
MICHAEL A. HAMMER, U.S.M.J.